

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

ROTHSCHILD BROADCAST DISTRIBUTION  
SYSTEMS, LLC,

Plaintiff,

v.

VIMEO, LLC,

Defendant.

CASE NO. 6:15-CV-232 RWS-JDL

**JURY TRIAL DEMANDED**

**JOINT MOTION TO DISMISS**

Plaintiff Rothschild Broadcast Distribution Systems, LLC and Defendant Vimeo, LLC, pursuant to Fed. R. Civ. P. 41, move for an order DISMISSING WITH PREJUDICE all claims asserted against Vimeo, LLC in this action, with each party to bear its own costs, expenses and attorneys' fees.

Respectfully submitted,

/s/ Charles Ainsworth

Charles Ainsworth  
State Bar No. 00783521  
Robert Christopher Bunt  
State Bar No. 00787165  
PARKER, BUNT & AINSWORTH, P.C.  
100 E. Ferguson, Suite 1114  
Tyler, TX 75702  
903/531-3535  
903/533-9687  
E-mail: charley@pbatyler.com  
E-mail: rcbunt@pbatyler.com

**ATTORNEYS FOR PLAINTIFF,  
ROTHSCHILD BROADCAST  
DISTRIBUTION SYSTEMS, LLC**

/s/ Jennifer H. Doan (with permission)

Jennifer H. Doan  
Texas Bar No. 08809050  
Haltom & Doan  
6500 Summerhill Road, Suite 100  
Texarkana, TX 75503  
Telephone: (903) 255-1000  
Facsimile: (903) 255-0800  
Email: jdoan@haltomdoan.com

Brent D. McCabe  
Texas Bar No. 24088004  
Haltom & Doan  
4975 Preston Park Blvd., Suite 625  
Plano, TX 75093  
Telephone: (469) 814-0433  
Facsimile: (469) 814-0422  
Email: bmccabe@haltomdoan.com

Michael A. Cheah  
Vimeo, LLC  
555 West 18th Street  
New York, NY 10011  
Tel: (212) 314-7457  
Fax: (212) 632-9547  
michael.cheah@iac.com

**ATTORNEYS FOR DEFENDANT  
VIMEO, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 24, 2015.

/s/Charles Ainsworth  
Charles Ainsworth